

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)**

UNITED STATES OF AMERICA)	
)	
v.)	Case No. 3:12-cr-137-AJT
)	
KOLON INDUSTRIES, INC.,)	
Including and through its successors)	
“Kolon Industries, Inc.” and “Kolon)	
Corporation”)	
JONG-HYUN CHOI,)	
IN-SIK HAN,)	
JU-WAN KIM,)	
KYEONG-HWAN RHO,)	
YOUNG-SOO SEO,)	
)	
Defendants.)	

DEFENDANTS’ MOTION FOR LEAVE TO APPEAR SPECIALLY

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PLEASE TAKE NOTICE that counsel for Specially-Appearing Defendant Kolon Industries, Inc. (“Kolon”)¹ hereby requests that the Court grant Kolon leave to appear specially for the limited purpose of filing a motion to quash the purported service of the summonses on Kolon and challenging the United States of America’s service attempts and this Court’s jurisdiction. This Motion is made on the grounds set forth in the accompanying Memorandum. If this request to appear specially is granted, Kolon will promptly file its Motion to Quash Service of the Summonses on the Superseding Indictment and to Vacate/Reconsider the February 2013 Order (the “Motion to Quash”), attached to the accompanying Memorandum as Exhibit A, and hereby requests a hearing date of December 19, 2014.

Respectfully submitted this 24th day of November, 2014.

By: /s/ Gretchen C. Byrd
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¹ “Kolon” refers to Kolon Industries, Inc. and any Kolon entity that the Government contends is both a party and the subject of the Government’s service efforts in the above-captioned action. The Superseding Indictment is fatally ambiguous as to the named defendant(s).

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of November, 2014, I electronically filed the foregoing document, entitled DEFENDANTS' MOTION FOR LEAVE TO APPEAR SPECIALLY, with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel named below:

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